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ATTORNEYS

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PARALEGALS

ROSA COSCIA
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Via: EDNY ECF

May 23, 2025

Honorable Judge Peggy Kuo, U.S.M.J.
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Martinez, et al. v. Atlantis Super Wash Center, Inc., et al.*; 23-cv-04667 (CBA)(PK)

Dear Hon. Judge Kuo,

I represent Plaintiffs in this FLSA action. I write pursuant to Your Honor's Individual Rules to provide this Joint Status Letter and Request for an Extension of Time to Complete Discovery. The Parties have conferred regarding this request and defense counsel consents to its filing. This is the second request for an extension; the Court granted the first.

The Parties have had several meaningful settlement discussions over the past two (2) months, and while the Parties are not far apart, it appears that we have met an impasse in negotiations. Therefore, defense counsel and I are in the process of scheduling deposition dates for the Parties.

Accordingly, we respectfully request an extension of time to complete discovery, from May 28, 2025 until July 31, 2025. That will give the Parties adequate time to complete depositions and exchange any further post-deposition discovery that may arise.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Keith E. Williams", is written over a light blue circular stamp.

Keith E. Williams, Esq.

cc: all counsel of record, via ECF.